

# EXHIBIT H

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

IN RE: ETHICON, INC., Master File No. 2:12-MD-02327  
PELVIC REPAIR SYSTEM MDL 2327  
PRODUCTS LIABILITY JOSEPH R. GOODWIN  
LITIGATION U.S. DISTRICT JUDGE

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ORAL DEPOSITION OF ANNE HOLLAND WILSON

MARCH 22, 2016

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THIS DOCUMENT RELATES TO THE  
FOLLOWING CASES IN WAVE 1 OF MDL 200:

Marty Babcock v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-10152

Daphne Barker, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-00899  
Bonnie Blake, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-00995

Sharon Boggs, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-00368  
Myra Byrd, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-00748

Angela Coleman, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-01267  
Constance Diano, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-01145

Dina Destefano-Raston, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-01299  
Monica Freitas, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-01146

Rose Gomez, et al. v. Ethicon, Inc., et al.  
Civil Action No. 2:12-cv-00344

1 (Marked Wilson Exhibit Nos. 1 - 7.)

2 ANNE HOLLAND WILSON,

3 having been first duly sworn, testified as follows:

4 E X A M I N A T I O N

5 BY MR. DAVIS:

6 Q. Good morning, Ms. Wilson. Would you state  
7 your full name for the record, please?

8 A. Anne Holland Wilson.

9 Q. Ms. Wilson, we've met. I'm Paul Davis. I'll  
10 be asking you some questions today. We'll get started.

11 I've handed you some premarked exhibits,  
12 1 through 7. Could you take a look at those? I think  
13 the first one is the notice of deposition. Are you  
14 familiar with it?

15 A. I've browsed it.

16 Q. And we've requested some documents just to  
17 bring with you. Can you just give us an overview of  
18 what, if anything, you brought with you today?

19 A. I believe there's a copy of each of my  
20 reports --

21 Q. Okay. Anything --

22 A. -- that are clean copies. They're in the  
23 binder there.

24 (Marked Wilson Exhibit Nos. 8 - 10.)

1 Q. Okay. So my follow-up question is: In your  
2 practice, do you ever have occasion to need to look at  
3 FDA guidance documents?

4 A. We look at them all the time.

5 Q. Okay. And do you rely upon FDA guidelines  
6 documents?

7 MR. WALLACE: For what?

8 Objection to form.

9 Q. (BY MR. DAVIS) For any purpose.

10 A. How does that relate to my reports here?

11 Q. You don't need to worry about that,  
12 Ms. Wilson. Just --

13 A. I believe --

14 MR. WALLACE: I wouldn't take advice from  
15 Mr. Davis. But go ahead and answer the question, if  
16 there's a question pending.

17 A. I look at FDA guidance documents all the time.

18 Q. (BY MR. DAVIS) Okay. And do you have  
19 occasion to rely on them?

20 MR. WALLACE: Objection to form; asked  
21 and answered.

22 A. They're guidance, and we use them as guidance.

23 Q. (BY MR. DAVIS) Okay. Have you worked on a  
24 team that used FDA guidance documents in connection with